UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	x	USDC SDNY DOCUMENT ELECTRONICALLY
AMERICAN SOCIETY OF MEDIA PHOTOGRAPHERS et al.,	:	DOC #: DATE PILED: & 117
Plaintiffs,	:	Raths man store and the store
,	:	ORDER
- against -		
GOOGLE, INC.,	:	10 Civ. 2977
,,	:	
Defendant.		

CHIN, Circuit Judge

The parties have submitted a joint letter, dated August 15, 2012, in which they ask the Court to enter a protective order governing pre-trial discovery. The parties have agreed on the form of the protective order, except for two aspects of paragraph eleven.

(DC)

The Court has considered the parties' arguments, and adopts Google's version of the protective order for the reasons set forth in the letter. See, e.g., Rywkin v. N.Y. Blood Ctr., No. 95 Civ. 10008, 1998 WL 556158, at *7 (S.D.N.Y. Aug. 31, 1998) ("[B]ecause of the possibility that any expert retained by the plaintiff may have a relationship with [a competitor of the defendant's research affiliate from whom confidential documents were sought], the defendant must have advance notice of the

identity of each expert and an opportunity to object to disclosure to that individual."); Bank of N.Y. v. Meridien BIAO Bank Tanzania Ltd., 171 F.R.D. 135, 145 (S.D.N.Y. 1997) (requiring the receiving party to "identify to [the producing party] all experts or consultants to whom [the receiving party] plans to show [documents found to contain confidential and proprietary information] . . . prior to the actual disclosure of the documents").

The Clerk of the Court shall accept the joint letter for filing and docketing, with Exhibit C redacted because it contains purportedly confidential information. As plaintiffs note, the materials do not appear to contain confidential matter, and Google is admonished to be more selective in designating documents confidential and highly confidential.

SO ORDERED.

Dated: New York, New York

August 17, 2012

DENNY CHIN

United States Circuit Judge

Sitting by Designation